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7 *Attorneys for Debtors and Reorganized Debtors*

8
9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

17 **Debtors.**

- 18 ☐ Affects PG&E Corporation
19 ☐ Affects Pacific Gas and Electric Company
20 ☒ Affects both Debtors

21 ** All papers shall be filed in the Lead Case, No.*
22 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**STIPULATION TO CONTINUE HEARING
ON REORGANIZED DEBTORS'
OBJECTION TO PROOF OF CLAIM NO.
2090 FILED BY AMIR SHAHMIRZA**

[Related to Docket No. 12130]

1 PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors
2 (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases
3 (the “**Chapter 11 Cases**”), on the one hand, and Creditor Amir Shahmirza (“**Shahmirza**,” and together
4 with the Reorganized Debtors, the “**Parties**” and each, a “**Party**”) on the other hand, by and through
5 their respective counsel, hereby stipulate and agree as follows:

6 **RECITALS**

7 A. On April 8, 2022, the Reorganized Debtors filed the *Reorganized Debtors’ Objection to*
8 *Proof of Claim No. 2090 Filed by Amir Shahmirza* (the “**Objection**”) [Docket No. 12130]. Concurrently
9 with the Objection, the Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’*
10 *Objection to Proof of Claim No. 2090 Filed by Amir Shahmirza* [Docket No. 12132], which set a hearing
11 on the Objection for May 10, 2022 (the “**Hearing**”).

12 B. On April 22, 2022, after the Parties conferred regarding continuing the Hearing and
13 response deadline for Shahmirza, the Reorganized Debtors filed the *Notice of Continued Hearing on*
14 *Reorganized Debtors’ Objection to Proof of Claim No. 2090 Filed by Amir Shahmirza* [Docket
15 No. 12208], which continued the Hearing to July 12, 2022.

16 C. On June 28, 2022, Shahmirza filed the *Response and Points and Authorities in Opposition*
17 *to Objection to Claim #2090* [Docket No. 12572].

18 D. The Parties have conferred again and have agreed to further continue the Hearing.

19
20 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, BY AND**
21 **BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES**
JOINTLY REQUEST THE BANKRUPTCY COURT TO ORDER, THAT:

- 22 1. The Stipulation is approved.
- 23 2. The Reorganized Debtors’ reply will be filed no later than October 4, 2022.
- 24 3. The Hearing on the Reorganized Debtors’ Objection to the claim of Amir Shahmirza is
25 continued to **October 11, 2022**, at 10:00 a.m. (Pacific Time).
- 26 4. The Stipulation and any Order approving the terms of this Stipulation are without
27 prejudice to any Party requesting a further continuance of the Hearing or otherwise modifying the
28 briefing schedule on the Objection.

1 5. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies
2 arising from this Stipulation or any Order approving the terms of this Stipulation.

3 6. In the event that the terms of this Stipulation are not approved by the Bankruptcy Court,
4 it shall be null and void and have no force or effect.

5
6 Dated: July 1, 2022

7 KELLER BENVENUTTI KIM LLP

COHEN AND JACOBSON, LLP

8
9 /s/ David A. Taylor

10 David A. Taylor
11 Attorneys for Debtors and
12 Reorganized Debtors

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/s/ Lawrence A. Jacobson

Lawrence A. Jacobson
Attorneys for Amir Shahmirza